

# **Exhibit A**

STATE OF INDIANA ) IN THE SHELBY SUPERIOR COURT  
 ) SS:  
COUNTY OF MARION ) CAUSE NO. 73D01-1907-CT-000023  
  
JERRY MUSGROVE, and )  
MIGUEL STANLEY, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
DAVID F. UDELL, and )  
TRIPLE C EXPRESS, I.L.C., )  
 )  
Defendants. )

**PLAINTIFF, JERRY MUSGROVE'S RESPONSE TO  
DEFENDANT, DAVID F. UDELL'S REQUEST FOR ADMISSIONS**

Comes now the Plaintiff, Jerry Musgrove, by counsel, Timothy A. Rowe, and responds to Defendant, David Udell's Request for Admissions as follows:

**Request for Admission No. 1:** The total of all of Plaintiff's damages arising from the accident for which Plaintiff seeks compensation does not exceed \$75,000.

**RESPONSE:** Plaintiff cannot admit or deny that as it is the discretion of the jury what they may award for pain and suffering and the nature and extent of my injuries and how the injuries have affected my activities of daily living and loss of enjoyment of life.

**Request for Admission No. 2:** Plaintiff will not personally seek damages from the Defendants in excess of \$75,000 at the trial of this matter.

**RESPONSE:** Plaintiff cannot admit or deny that as it is the discretion of the jury what they may award for pain and suffering and the nature and extent of my injuries and how the injuries have affected my activities of daily living and loss of enjoyment of life.

Respectfully submitted,

ROWE & HAMILTON

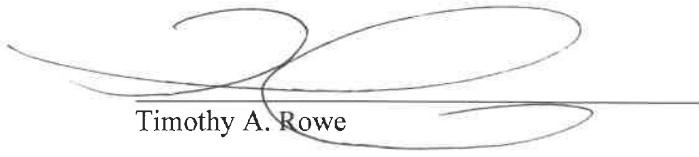
Timothy A. Rowe, Attorney #6554-49  
Attorney for Plaintiffs, Jerry Musgrove and  
Miguel Stanley

**ROWE & HAMILTON**  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served by the Court's ECF service distribution, this 3rd day of February, 2020, to:

Christopher R. Whitten  
Matthew K. Phillips  
Whitten Law Office  
6801 Gray Road, Suite H  
Indianapolis, IN 46237  
cwhitten@indycounsel.com  
mphillips@indycounsel.com

  
Timothy A. Rowe

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                       )  
Defendants. )

**PLAINTIFF, MIGUEL STANLEY'S RESPONSE TO  
DEFENDANT, DAVID F. UDELL'S REQUEST FOR ADMISSIONS**

Comes now the Plaintiff, Miguel Stanley, by counsel, Timothy A. Rowe, and responds to Defendant, David Udell's Request for Admissions as follows:

**Request for Admission No. 1:** The total of all of Plaintiff's damages arising from the accident for which Plaintiff seeks compensation does not exceed \$75,000.

**RESPONSE:** Plaintiff cannot admit or deny that as it is the discretion of the jury what they may award for pain and suffering and the nature and extent of my injuries and how the injuries have affected my activities of daily living and loss of enjoyment of life.

**Request for Admission No. 2:** Plaintiff will not personally seek damages from the Defendants in excess of \$75,000 at the trial of this matter.

**RESPONSE:** Plaintiff cannot admit or deny that as it is the discretion of the jury what they may award for pain and suffering and the nature and extent of my injuries and how the injuries have affected my activities of daily living and loss of enjoyment of life.

Respectfully submitted,

ROWE & HAMILTON

Timothy A. Rowe, Attorney #6554-49  
Attorney for Plaintiffs, Jerry Musgrove and  
Miguel Stanley

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